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**ACTION MEMORANDUM: SILO 3 REMOVAL
ACTION**

12-13-91

DOE/WEMCO

DOE-515-91

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LETTER



Department of Energy
Fernald Environmental Management Project
P.O. Box 398705
Cincinnati, Ohio 45239-8705
(513) 738-6357

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DEC 13 1991

DOE-515-91

Mr. W. H. Britton, President
Westinghouse Environmental Management Company
P. O. Box 398704
Cincinnati, Ohio 45329-8704

Dear Mr. Britton:

SILO 3 REMOVAL ACTION - ACTION MEMORANDUM

References: Letter, WEMCO:IRS&T(RSG):91-079, D. V. Spahr to D. A. Nixon,
"Survey Results of the Hopper Atop Silo # 3", dated December 11,
1991

During preparation of the Best Management Practice (BMP) Work Plan for Silo 3, a radiation survey was performed. The radiological survey results did not reveal any significant radiological conditions. However, a visual inspection of the dust collector, that is currently located on the dome of Silo 3, revealed that approximately one-third of the west side of the dust collector hopper has rusted away. Further inspection revealed the presence of radioactive material inside the hopper. The material is solid and extends several inches above the bottom of the opening.

As a result of the radiation survey and consistent with Section 40 CFR 300.410 of the NCP, the DOE Fernald Office has determined the need for an removal action to mitigate the potential release of material to the environment. Eight factors that were considered in this determination are listed in 40 CFR 300.415 (b)(2). The following factors specifically apply to the conditions identified as a result of the radiation survey conducted on December 9, 1991.

40 CFR 300.415 (b)(2)(i)

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants.



Recycled and Recyclable

40 CFR 300.415 (b)(2)(ii)

Actual or potential contamination of drinking water supplies or sensitive ecosystems.

40 CFR 300.415 (b)(2)(iii)

Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers, that may pose a threat of release.

40 CFR 300.415 (b)(2)(v)

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released.

The Silo 3 Removal Action to mitigate the potential release of material to the environment should include the following actions:

- All obvious openings in the dust collector hopper shall be covered and sealed
- The dust collector shall be removed
- All obvious pathways for release shall be capped or covered

A scope of work for implementation of the actions listed above should be prepared and submitted to the DOE Fernald Office by December 17, 1991.

If you have any questions, please contact me at (513) 738-9180 or FTS 774-9180.

Sincerely,

for Ray Hanson
for R. E. Tiller, Manager
Fernald Office

DP-84:Craig

cc:

R. B. Allen
J. R. Craig
J. P. Hopper, WEMCO

Administrative Record File